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April 4, 2003

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Prior Notice of Imported Food; Registration of Food Facilities Under the
Public Health Security and Bioterrorism Preparedness and Response Act
of 2002; Notices of Proposed Rulemaking; Docket Nos. 02N-278 and

~~02N-0276~~

Comments of Formatta Corporation

Dear Sir or Madam:

These comments are submitted on behalf of Formatta Corporation ("Formatta"). Formatta Corporation provides eform solutions that enable businesses and government to capture securely and transfer electronic data using the familiar interface of a form. The Formatta technology is built for maximum portability, security and automation and addresses all government and industry requirements.

In reviewing the proposals of the Food and Drug Administration to implement provisions of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 ("the Bioterrorism Act") concerning registration of food facilities and prior notice of imported foods, it is apparent to Formatta that its technology would provide numerous advantages over the IT systems that FDA appears to contemplate for the receipt of millions of "forms" each year.

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Dockets Management Branch (HFA-305)

April 4, 2003

Page 2

The Formatta technology would substantially ease the burden of compliance with the registration and prior notice requirements and thus reduce the economic cost of the regulations. Persons who are required to file with the FDA would be able to complete forms offline, save partially completed forms for filing later, and send the data and information to FDA safely and securely. In short, the Formatta technology provides a solution to virtually every IT problem that will be encountered in developing and operating a classic web-based registration and prior notice system.

We have included with these comments numerous sheets that provide additional information about the Formatta technology. Additional information can be found at our website: www.formatta.com. Formatta would be delighted to demonstrate to FDA how its technology would benefit FDA, the food industry and ultimately the public.

Sincerely,

A handwritten signature in black ink that reads 'Richard M. Stolbach' followed by a stylized flourish.

Richard M. Stolbach
Counsel to Formatta Corporation

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Enclosures